

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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NSTAR Electric Company)	D.T.E. 06-40
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ATTORNEY GENERAL'S
DOCUMENT AND INFORMATION REQUESTS

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Boston Edison Company ("Boston Edison"), Cambridge Electric Light Company ("Cambridge"), Commonwealth Electric Company ("Commonwealth"), and Canal Electric Company ("Canal") (together the "Companies"), d/b/a NSTAR Electric ("NSTAR"), or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If NSTAR or the Companies cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide three copies of each response.
16. The term "Companies" refers to Boston Edison, Cambridge Electric Light Company, Commonwealth Electric Company, and Canal Electric Company. The term "NSTAR" refers to NSTAR Electric Company. Unless the request specifically provides otherwise, the term Companies and NSTAR includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

NSTAR Electric Company

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D.T.E. 06-40

ATTORNEY GENERAL'S FIFTH SET OF
DOCUMENT AND INFORMATION REQUESTS

- AG-5-1 Please provide for the years 2002-2006, to date, each of the Companies' default service monthly revenue and expense by customer class and pricing zone. If, for any month, there is an adjustment of \$5,000 or more, explain each such adjustment. Include all calculations, workpapers and assumptions.
- AG-5-2 If NSTAR had blended the default service rates beginning in January 2005, what would the rates have been compared to the actual rates by customer class and pricing zone. Show each rate component separately--vendor rates and Company adders. Include all calculations, workpapers and assumptions.
- AG-5-3 Refer to the response to AG-4-4. Please identify by amount and page and line reference the total amount of the 13.8kV system revenue requirement. If this was not the amount that was removed from distribution rates when Cambridge's rates were unbundled, explain the difference and reconcile the difference to the cost of service provided in the response to AG-4-4.
- AG-5-4 Refer to Exhibit NSTAR-CLV-1, page 18, lines 9-18. Please describe the work that needs to be done in order to transfer the Cambridge load to the new East Cambridge Substation.
- a. When will this transfer be completed?
 - b. What is the estimated load that will be transferred, in kW and kWh?
Please provide the load data by customer class.
 - c. What is the 2006 cost of the related capital projects and how will these costs be recovered from customers?
 - d. When will the SCR/RMR payments to Mirant Kendall terminate?
When did NSTAR officially notify Mirant that the Kendall station would not be needed for local reliability? What is the required notice period?
 - e. What is the current monthly SCR/RMR costs for the Mirant Kendall Station? If there are no payments being made, what was the cost for 2006?

- AG-5-5 Refer to Exhibit NSTAR-CLV-1, page 19, lines 13-16. Please provide current estimates of the under/over recovery of transmission costs at December 31, 2006, for each Company. Include all supporting workpapers, calculations and assumptions.
- AG-5-6 Please provide current estimates of the under/over recovery of basic service costs and basic service cost adders at December 31, 2006, for each Company. Include all supporting workpapers, calculations and assumptions.
- AG-5-7 Please provide current estimates of the of pension adjustment factor costs, including reconciliation of prior period under/over recoveries at December 31, 2006, for each Company. Include all supporting workpapers, calculations and assumptions.
- AG-5-8 Based on the response to the three previous questions and a blended current default service rate, please recalculate the bill impact analyses provided in response to AG-2-2. The response should incorporate NSTAR's most recent estimates of what customers' bills will be effective January 1, 2007 by reflecting all rate element changes. To the extent AG-2-2 did not include transmission costs for all transmission cost elements (RNS, LNS, Scheduling and Dispatch, Congestion Management and SCR, System Restoration and Planning, REMVEC, VAR support, NEPOOL/ISO administrative costs, etc.), please include estimates of the excluded elements in this response. Also, include the impact of estimated CPSL program cost adjustments and SIP adjustments. Provide the response in the form of working Excel spreadsheet models with all formulae and cell references in tact as well as a hard copy. Include all supporting documentation, workpapers, calculations and assumptions.
- AG-5-9 Please refer to the response to Exhibit NSTAR-CLV-1, pages 22-23. For each element of the Test, explain the event or series of events or actions that changed the 1997 Test responses from "No" to "Yes" in 2007. Include the date(s) that each event or action occurred and provide the details of all costs associated with each event/action. Include all supporting documentation, workpapers, calculations and assumptions. Provide a map of the 1997 13.8kV system similar to the one provided in response to DTE-3-12.
- AG-5-10 Refer to the response to AG-4-2. Please provide estimates of capital spending for the years 2006 through 2010. For Cambridge, separately identify the 13.8kV related spending estimates. If the Company does not have capital spending estimates, explain why.

- AG-5-11 Will the Company seek to recover through the CPSL adjustment any costs related to the Cambridge 13.8kV system? If yes, please provide the most recent estimates of the annual CPSL budgets for Cambridge 13.8kV and NSTAR non-Cambridge 13.8kV projects. Include an estimate of the related CPSL rate adjustment for each year. Include all supporting documentation, workpapers, calculations and assumptions.
- AG-5-12 Refer to Exhibit NSTAR-CLV-1, page 25, lines 10-12. Given that there would be an annually declining rate base under the proposed transmission tariff treatment of Cambridge's 13.8kV system, please explain and illustrate how the Company will "... ensure that neither NSTAR Electric nor customers receives or pays more than they otherwise would have."
- AG-5-13 Referring to the Company's response to Information Request DTE-1-7, please itemize and specify each and every one of the covenants and restrictions referred to in the response, along with references to the indenture agreements for those covenants, and compare them with the restrictions for the other debt, again with references to the indenture agreements. Please also provide a complete and detailed description of the reasons that each one of the Commonwealth Energy covenants causes the other debt to be more risky with regard to its existing covenants of the other debt.
- AG-5-14 Referring to the Company's response to Information Request DTE-1-7, please provide complete copies of the indenture agreements for the "other" debt issues of Boston Edison and NSTAR referred to in that response.

DATED: July 26, 2006